

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 97-239-C

In Re:)	
)	
Proceeding to Establish Guidelines)	ITC^DELTACOM'S FIRST
For an Intrastate Universal Service)	SET OF INTERROGATORIES
Fund)	TO BLUFFTON TELEPHONE
)	COMPANY, INC., HARGRAY
)	TELEPHONE COMPANY, INC.,
)	HOME TELEPHONE COMPANY,
)	INC., HORRY TELEPHONE
)	COOPERATIVE, INC., AND PBT
)	TELECOM

ITC^DeltaCom Communications, Inc. ("DeltaCom") hereby files its First Set of Interrogatories to to Bluffton Telephone Company, Inc., Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc., and PBT Telecom ("SCTC"). DeltaCom requests that responses should be provided no later than January 18, 2004 pursuant to S.C. Code Ann. Regs. 103-851.

DEFINITIONS

1. "The Act" means the Telecommunications Act of 1996, Pub. L. 104-104, 110 Stat. 56 (1996).
2. "ADSL" means asynchronous digital subscriber line technology.
3. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information what would not otherwise not be brought within their scope.
4. "SCTC" means Bluffton Telephone Company, Inc., Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc., and PBT Telecom, and their parents, subsidiaries, and affiliates, their present and former officers,

employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of these companies of the SCTC.

5. "CLEC" means competitive local exchange carrier.

6. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to, conversations, telecommunications, and documents.

7. "Documents" is used in the broadest sense and includes all tangible things that record information, whether or not such things are in SCTC's possession, custody or control, and regardless of who prepared or signed them. "Documents" includes both the original and any copy or draft, and all copies which contain any notation not on the original. Examples of "documents" include, but are not limited to, handwritten, typed or printed papers, handwritten notations, office notes, calendar entries, diaries, notes of telephone conversations, photographs, reports, receipts, invoices, memoranda, correspondence, notes, ledger entries, and computer printouts, cards, tapes, disks, and other means of electronically or magnetically maintained information.

8. "Identify" means (1) when used with reference to a natural person, give the person's full name, business or residence address, business or residence telephone numbers, occupation and employer; (2) when used with reference to an entity, give the entity's full name, principal place of business, address and telephone number; (3) when used with reference to a document, give the document's date, title, author, recipient, type (*e.g.*, letter, memorandum, note, *etc.*), name of the custodian of the document, and a description of the contents with sufficient specificity to be the basis for discovery; and (4) when used with reference to an action taken by an entity, identify the person(s) taking the action, describe the nature of the action, and give the date on which the action was taken. If any action identified pursuant to (4) involved a communication with another person, identify the person(s) with whom the actor(s) communicated; and, if the communication was through the use of a document, identify the document through which the communication was made.

9. "Person" includes a natural person, partnership, joint venture, firm, corporation, association, organization, or any other type of business or legal entity.

10. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

11. "x-DSL" means any of the various digital subscriber line ("DSL") technologies. The "x" is a place holder for the various types of DSL services.

12. The terms "you" and "your" refer to SCTC.

13. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

INSTRUCTIONS

1. If you contend that information or documents responsive to a data request may be withheld under the attorney-client privilege, the attorney work product doctrine or other privilege, please state the following to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the information or the document;
- d) the date of the information or document;
- e) the individual(s) who prepared the information or document.

2. Provide the names, addresses and positions of each person responsible for preparing each of the answers to the following data requests, and of each person providing information used in the preparation of each answer.

3. If you maintain that any document or record which refers to or relates to anything about which these data requests ask or that would be responsive to any of the data requests has been destroyed, set forth the contents of said document, the location of any copies of said

document, the date and circumstances of said destruction and the name of the person who ordered or authorized such destruction.

4. In answering these data requests, furnish all information and responsive documents in the possession of SCTC or in the possession of any director, officer, employee, agent, representative, or attorney of SCTC.

5. If you cannot answer any data request in full after exercising due diligence to secure all the information requested, or do not have precise information with regard to any part of a data request, please so state, describing your efforts to obtain the information requested, and then proceed to answer to the extent possible.

6. When the information requested by a data request varies over time, state the response for each period of time as to which the response differs, and identify the time periods applicable to each portion of the response.

7. Where the data requested, including but not limited to cost studies and related information, is or can be made available on diskette, please provide the documentation on diskette and indicate the format in which the data is provided.

8. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses subsequently become known. Any revised cost studies filed by SCTC should be accompanied by corresponding changes to the responses provided pursuant to these data requests.

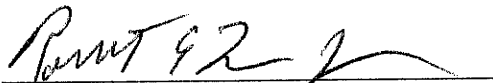
INTERROGATORY

1. Has SCTC prepared a cost study, business analysis, or have any workpapers supporting its request for additional State USF withdrawals?

(a) If the answer to this Interrogatory is "yes," identify each such cost study, business analysis or workpaper and state the date/time period covered by the cost study or business analysis

- (b) If the answer to this Interrogatory is "yes," provide the names and titles of the person(s) who prepared the cost study, business analysis or work papers that support SCTC's request for additional State USF withdrawal.

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January 8, 2004

CERTIFICATE OF SERVICE

This is to certify that the undersigned is employed by Sowell Gray Stepp & Laffitte, LLC, attorneys for ITC^DeltaCom and that she has caused the foregoing to be served upon the person(s) named below, by placing copies of same in the United States Mail, postage prepaid, addressed as follows and via electronic mail:

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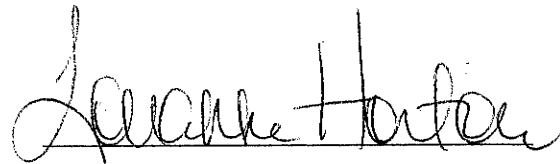
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Jan. 8, 2004

A handwritten signature in cursive script, appearing to read "Lauren Hunter", written over a horizontal line.